

# Exhibit Q

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA  
3 SAN FRANCISCO DIVISION

4 - - - - - x  
5 LAUREN HUGHES, et al., on :  
6 behalf of themselves and :  
7 all others similarly situated, :  
8 Plaintiffs, : Case No.  
9 v. : 3:22-cv-07668-VC  
10 APPLE INC., a California :  
11 corporation, :  
12 Defendant. :  
13 - - - - - x

14  
15 Videotaped Deposition of JENNIFER GOLBECK, Ph.D.  
16 Washington, DC  
17 Thursday, December 4, 2025  
18 9:16 a.m.  
19  
20  
21  
22

23 Job No. 605765  
24 Pages: 1 - 176  
25 Reported by: Janet A. Hamilton, RDR

A P P E A R A N C E S

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ALSO PRESENT:

DONTE ROBINSON, Videographer

Transcript of Jennifer Golbeck, Ph.D.  
Conducted on December 4, 2025

7

1 JENNIFER GOLBECK, Ph.D.,  
2 a witness herein, being duly sworn, testified as  
3 follows:

4 EXAMINATION BY COUNSEL FOR DEFENDANT  
5 BY MS. BARLOW:

6 Q Good morning. As I just mentioned, my  
7 name is Alexandra Barlow, and I represent the  
8 defendant Apple in this case.

9 Could you state and spell your name for  
10 the record?

11 A Yeah. Jennifer Golbeck, J-E-N-N-I-F-E-R  
12 G-O-L-B-E-C-K.

13 Q Have you ever gone by any other names?

14 A No.

15 Q Have you ever been deposed before?

16 A Yes.

17 Q How many times?

18 A 15 or 20.

19 Q How many times have you been deposed as an  
20 expert?

21 A All of those were as an expert.

22 Q When was the last time you were deposed?

23 A Maybe a year ago.

24 Q Have you ever testified at trial before?

25 A Yes.

09:17:14

09:17:14

09:17:17

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09:17:40

09:17:43

09:17:44

09:17:46

09:17:49

09:17:53

09:17:56

1	A That's correct.	09:53:45
2	Q Did you review any documents produced by	09:53:48
3	Apple in this case to prepare your declaration?	09:53:50
4	A No.	09:53:54
5	Q Did you review any of the plaintiffs'	09:53:55
6	discovery responses to prepare your declaration?	09:53:58
7	A No.	09:54:01
8	Q Why not?	09:54:02
9	A I wasn't given them.	09:54:04
10	Q Have you reviewed any of the documents	09:54:07
11	that the plaintiffs have produced in this case?	09:54:10
12	A No.	09:54:13
13	Q Why not?	09:54:13
14	A I wasn't given them.	09:54:13
15	Q Have you reviewed any of the transcripts	09:54:15
16	for depositions taken in this case?	09:54:18
17	A No.	09:54:20
18	Q And why not?	09:54:21
19	A Wasn't given them.	09:54:22
20	Q Did you get all of the documents that you	09:54:25
21	needed in order to reach the opinions you've	09:54:27
22	included in this declaration?	09:54:29
23	A Yes.	09:54:31
24	Q Have you spoken to any of the plaintiffs	09:54:34
25	in this case?	09:54:37

1	plaintiffs' harms or emotional reactions were	12:08:15
2	similar or different in any way?	12:08:18
3	A No.	12:08:20
4	Q Did you ever evaluate whether the same	12:08:23
5	AirTag feature was implicated in each incident?	12:08:26
6	A No.	12:08:30
7	Q Turning back to your declaration, in	12:08:37
8	paragraph 43, it says, "Based upon my review of	12:08:42
9	available literature, the Complaint in this case,	12:08:47
10	the proposed class definitions provided to me by	12:08:51
11	class counsel and the declarations by the proposed	12:08:54
12	class representatives provided to me by class	12:08:57
13	counsel, I believe that the plaintiffs in this	12:08:59
14	case are at an increased risk of continued	12:09:01
15	stalking."	12:09:03
16	Do you see that?	12:09:04
17	A Yes.	12:09:04
18	Q Is it your contention that all 41	12:09:12
19	plaintiffs in this case are at the same increased	12:09:15
20	risk of continued stalking?	12:09:17
21	A So I'm really speaking here statistically,	12:09:20
22	right, that we know from the literature that if	12:09:24
23	you have been stalked in the past, you are like,	12:09:27
24	more likely to be stalked again. You could do	12:09:30
25	separate analyses for each individual person if	12:09:35

1 you were doing a sort of, like, law enforcement 12:09:38  
2 type analysis, but I was really looking at this at 12:09:42  
3 a higher level, right. 12:09:45

4 I didn't speak -- as you established, I 12:09:46  
5 didn't speak to any of these class 12:09:48  
6 representatives, but as a whole, we know that 12:09:49  
7 simply by being someone who was stalked before, 12:09:51  
8 you are statistically more at risk for being 12:09:54  
9 stalked again. 12:09:57

10 Q Is it your opinion that someone is more 12:09:58  
11 likely to be stalked again if they were stalked by 12:10:01  
12 someone they knew? 12:10:05

13 A I don't think I offer opinions separating 12:10:09  
14 that out, whether -- whether those risks are 12:10:12  
15 different based on if it was stranger or, like, 12:10:14  
16 intimate partner stalking the first time. 12:10:17

17 Q So your opinion about the increased risk 12:10:19  
18 of continued stalking isn't tied to who the 12:10:21  
19 stalker was; is that correct? 12:10:24

20 A It's looking at overall trends in 12:10:26  
21 stalking -- or patterns rather. 12:10:29

22 Q Is it your opinion that the plaintiffs 12:10:34  
23 here are at the same increased risk of continued 12:10:37  
24 stalking? 12:10:40

25 A Again looking at -- at the high level 12:10:43

1       were not -- whatever their criteria was --       12:22:05  
2       arrested or charged again.       12:22:06  
3           Q   You agree that not every person who stalks       12:22:08  
4       someone stalks again; correct?       12:22:11  
5           A   That seems to be true.   Yes.       12:22:13  
6           Q   Did you quantify the amount of risk that       12:22:16  
7       increased in forming your opinions of continued       12:22:22  
8       stalking?       12:22:26  
9           A   Like did I calculate what the increased       12:22:27  
10      percentage likelihood is?       12:22:30  
11          Q   Yes.       12:22:32  
12          A   I didn't, and that seems to be unknown.       12:22:33  
13      There is -- there's a lot of papers looking at       12:22:36  
14      stalking recidivism, and the numbers are kind of       12:22:38  
15      all over the place, depending on, like, what the       12:22:41  
16      definition is.       12:22:44  
17              If we use, generally, the definition that       12:22:45  
18      I use here, the reason that we don't study that is       12:22:47  
19      we don't have the data.   How are we going to talk       12:22:50  
20      to people who have been stalked who've, like,       12:22:52  
21      never filed charges, who have never talked to       12:22:55  
22      anybody about it, right?   These are problems that       12:22:57  
23      come up all the time when we're looking at this       12:22:59  
24      intersection of psychology and criminology is --       12:23:01  
25      you know, we -- we hear this all the time with,       12:23:04



1 like, women who are reportedly victims of sexual  
2 assault. We know most of them don't report it and  
3 so it's hard to get a handle on what the actual  
4 numbers are. That seems to be the case here.

5 So I -- I didn't attempt to do that, and,  
6 you know, the attempts to do it all kind of come  
7 up with differing numbers. The terms are clear.  
8 The risk absolutely increases. Stalkers often go  
9 on to stalk again, but coming up with the exact  
10 percentages is tricky.

11 Q So you can't say how much of an increased  
12 risk there is that the plaintiffs in this case  
13 will be stalked again; correct?

14 A That's right.

15 Q And you agree that some stalkers never  
16 stalk again; correct?

17 A That seems to be the case, yes.

18 Q Are you aware that some of the plaintiffs  
19 testified that they're no longer worried about  
20 being stalked by their alleged stalkers?

21 A I have only read their declarations.

22 Q Do you know if any of the 41 named  
23 plaintiffs have experienced any stalking since  
24 they learned about the alleged stalking with an  
25 AirTag?

2	Q Do you know if any of the 41 named	12:24:10
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4	AirTag since the first time that they found the	12:24:18
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5	AirTag?	12:24:20
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6	A I don't know.	12:24:21
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8	were able to find an AirTag using the unwanted	12:24:25
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9	tracking prompts on their phone?	12:24:29
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10	A I think -- maybe it was -- I think one of	12:24:31
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11	them -- at least one of them did find it and I	12:24:34
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12 | don't know -- I think what the declaration said is | 12:24:39
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13	they don't know if they found all, but they did	12:24:41
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14	find one. Maybe a couple of them said that.	12:24:43
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15	Q When you opine that the plaintiffs in this	12:24:48
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16	case are at an increased risk of continued	12:24:51
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17	stalking, do you have an opinion on how they might	12:24:53
----	--	----------

18	be stalked again?	12:24:57
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19	A Like what methods of stalking the	12:24:58
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20	perpetrator would use?	12:25:02
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21	Q Correct.	12:25:03
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22	A I don't offer any opinions on the method.	12:25:04
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23	Q Is it your opinion that they could be	12:25:06
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24	stalked again with something other than an AirTag?	12:25:08
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25	A Sure. That's possible.	12:25:11
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1 Q So the risk of continued stalking is not 12:25:15  
2 tied to the AirTag necessarily; correct? 12:25:18

3 A Just to make sure that I'm clear, so -- 12:25:25  
4 yeah. The fact that there is an increased risk of 12:25:29  
5 being stalked again doesn't necessarily mean that 12:25:32  
6 if they are stalked again it will be with an 12:25:35  
7 AirTag. 12:25:37

8 Q And the literature and publications that 12:25:39  
9 you looked at in coming to this conclusion that 12:25:42  
10 the plaintiffs in this case are at an increased 12:25:46  
11 risk of continued stalking was not specific to 12:25:48  
12 stalking with an AirTag; correct? 12:25:52

13 A Correct. I mean, I do -- obviously you 12:25:55  
14 have brought this forward. There are papers 12:25:59  
15 specifically about AirTags in here, but the 12:26:01  
16 recidivism papers are not looking at AirTag 12:26:03  
17 tracking specifically. 12:26:06

18 Q And you have not reviewed any data showing 12:26:07  
19 stalkers repeatedly used AirTags to stalk the same 12:26:10  
20 person; correct? 12:26:13

21 A I -- I certainly don't call that out in 12:26:16  
22 the declaration here. I don't remember if I've 12:26:18  
23 seen anything about that or not. 12:26:20

24 Q And you yourself have not conducted any 12:26:22  
25 studies or research into stalkers repeatedly using 12:26:25

1 an AirTag to stalk the same person; correct? 12:26:28

2 A I have not done that research. 12:26:30

3 Q Did you consider whether any safety 12:26:33

4 updates, like Android alerts, have reduced the 12:26:35

5 risk of repeat stalking for the plaintiffs? 12:26:38

6 A I did not. 12:26:40

7 Q Have you considered any of AirTag safety 12:26:42

8 features in your analysis of the risk of continued 12:26:45

9 stalking? 12:26:48

10 A No. I'm really relying on the -- the 12:26:50

11 literature that shows generally that there's an 12:26:54

12 increased likelihood of being stalked again. 12:26:57

13 Q Before preparing your declaration for this 12:27:00

14 case, had you researched stalker recidivism 12:27:02

15 before? 12:27:06

16 A Yes. In the close relationships class 12:27:07

17 that I did at Harvard, because I tend to study bad 12:27:09

18 things people do, I was especially interested in 12:27:14

19 domestic violence and stalking, so I knew some of 12:27:18

20 these papers from that. 12:27:21

21 Q And that was when you were getting your 12:27:22

22 master's in psychology; correct? 12:27:24

23 A Yeah. That was one of the earlier classes 12:27:25

24 I took, so maybe 2022. 12:27:28

25 Q You can't predict which plaintiff, if any, 12:27:29

1	nuance that I'm missing in your question.	13:22:24
2	Q So you agree it's not the availability of	13:22:26
3	technology that drives continued stalking;	13:22:30
4	correct?	13:22:36
5	A I think generally that's true. I think	13:22:36
6	it's -- there -- there are probably some cases,	13:22:39
7	but generally it's not the case that, like,	13:22:43
8	someone is, like, ah-ha, there is an AirTag, now	13:22:47
9	I'm going to start stalking this person I had no	13:22:51
10	interest in stalking before. I think that's fair.	13:22:54
11	Q Do you agree that stalkers often adapt	13:23:04
12	their methods when confronted with barriers?	13:23:07
13	A I think that's borne out in the	13:23:12
14	literature, yes.	13:23:14
15	Q So, for example, if a victim blocks a	13:23:14
16	stalker on social media, the stalker might switch	13:23:17
17	to texting or e-mail?	13:23:20
18	A Yes. That definitely happens, and I'd say	13:23:24
19	that -- yeah, I agree.	13:23:28
20	Q And you agree that stalking is a pattern	13:23:37
21	that can be carried out through many different	13:23:39
22	means; correct?	13:23:41
23	A Yes.	13:23:42
24	Q And you're not aware of any evidence	13:23:43
25	showing that Bluetooth trackers are the preferred	13:23:45

CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC

I, Janet A. Hamilton, Registered Diplomate  
Reporter and Notary Public before whom the  
foregoing deposition was taken, do hereby certify  
that the foregoing transcript is a true and  
correct record of the testimony given; that said  
testimony was taken by me stenographically and  
thereafter reduced to typewriting under my  
direction; that review was not requested; and that  
I am neither counsel for, related to, nor employed  
by any of the parties to this case and have no  
interest, financial or otherwise, in its outcome.

IN WITNESS WHEREOF, I have hereunto set my hand  
this 9th day of December, 2025.

*Janet A. Hamilton*



Registered Diplomate Reporter

My commission expires

March 31, 2028